

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

RETRACTABLE TECHNOLOGIES, INC. Plaintiff	
v.	02MC139
BECTON DICKINSON & COMPANY, et al. Defendants	

**PLAINTIFF-S AMENDED UNCONTESTED MOTION FOR EXTENSION
OF TIME TO FILE A RESPONSE TO EMERGENCY CARE RESEARCH
INSTITUTE’S (“ECRI”) MOTION TO QUASH
OR IN THE ALTERNATIVE FOR A PRTECTIVE ORDER**

Comes now Plaintiff Retractable Technologies, Inc. (ARTI@), and files this their Amended Uncontested Motion for Extension of Time to File a Response to Emergency Care Research Institute’s (referred to hereafter as “ECRI@) Motion to Quash or in the Alternative for Protective Order. Supporting this motion, Plaintiff respectfully shows this Honorable Court the following:

1. On or about May 28, 2002, ECRI filed with the Court it’s Motion to Quash Pursuant to Fed.R.Civ.P. 45(c) or in the Alternative for a Protective Order Pursuant to Fed.R.Civ.P. 45(c) and 26. Pursuant to Local Rule 7.1(c), Plaintiff was required to file a response to ECRI’s Motion to Quash or in the Alternative for Protective Order on or before Tuesday, June 11, 2002.

2. The parties are attempting to resolve their differences and reach an agreement regarding the production of documents from ECRI. ECRI has agreed to allow Plaintiff Retractable Technologies, Inc. additional time in which to file its response to ECRI’s Motion to Quash or in the Alternative for Protective Order pending their discussion regarding a protective order. The parties have now agreed to allow Retractable Technologies, Inc. an additional week from the deadline of

June 17, 2002, in which to file a response. Said response shall now be due on or before Monday, June 24, 2002.

WHEREFORE, PREMISES CONSIDERED, Plaintiff respectfully requests that the Court enter an order granting it's Amended Uncontested Motion for Extension of Time to File a Response to ECRI's Motion to Quash or in the Alternative for Protective Order. Plaintiff further prays for such other relief to which it may be justly entitled.

Respectfully submitted,

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MOTION AGREED TO:

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CERTIFICATE OF SERVICE

I hereby certify that I have forward a true and correct copy of Plaintiff's Amended Uncontested Motion for Extension of Time to File a Response to ECRI's Motion to Quash or in the Alternative Motion for Protection to the following counsel of record by U.S. mail, certified mail, return receipt requested, and/or facsimile transmission on this _____ day of June, 2002:

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